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September 21, 2010

Honorable Nicholas G. Garaufis
United States District Court Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Timothy Glass
Criminal Docket No. 10-195(NGG)

Dear Judge Garaufis:

Please accept this letter application on behalf of my client Timothy Glass ("Glass") requesting permission for CJA-funds to retain the services of a licensed private investigator to assist me in my representation of Mr. Glass in the above-captioned matter.

Mr. Glass is presently charged with a Hobbs Act robbery involving the use of a weapon. In my discussion with Assistant U.S. Attorneys assigned to the case, I have been informed that, based upon Mr. Glass' criminal record and other crimes under investigation, the government views Mr. Glass as a career criminal facing mandatory life in prison. To properly prepare for trial and also to continue fruitful plea discussions, I find it necessary to retain the services of a private investigator to interview numerous witnesses, to research the facts of Mr. Glass' prior convictions and obtain public records concerning the incidents, to investigate the lengthy backgrounds of several government cooperators and interview witnesses to their numerous incidents of criminal conduct, and to assist in investigating and evaluating the numerous other offenses under scrutiny by the federal and state governments.

Based upon the above, we respectfully request that the Court authorize CJA-funds for the services of an investigator to assist me in properly representing Mr. Glass in connection with the captioned matter at a rate of \$95.00 per hour, plus mileage, tolls, parking and other reasonable fees incurred in connection with said services, with the total amount not to exceed \$10,000, absent further order of the Court. A proposed order is submitted for the Court's consideration.

Respectfully submitted,

Robert P. LaRusso

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
- - - - - X

UNITED STATES OF AMERICA

- against -

**ORDER AUTHORIZING CJA
FUNDS FOR INVESTIGATOR**

TIMOTHY GLASS,

Crim.No. 10-195(NGG)

Defendant.

- - - - - X

This matter having come before the Court on letter application by Robert P. LaRusso, attorney for the defendant Timothy Glass ("Glass"), for an order authorizing payment for services of an investigator in the above-captioned case, and for good cause shown,

IT IS HEREBY ORDERED, that Robert P. LaRusso, attorney for Mr. Glass, is authorized to retain the services of a licensed private investigator to perform investigative services in connection with the above-captioned case, with the cost to be paid pursuant to the Criminal Justice Act ("Act"), at a rate of \$95.00 per hour, plus mileage, reasonable transportation fees, including tolls and parking, as authorized by the Act, with the total amount to be paid not to exceed \$10,000, absent further order of the Court.

Dated: September , 2010
Brooklyn, New York

Honorable Nicholas G. Garaufis
U.S. District Court Judge
Eastern District of New York